

# Exhibit F

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

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PACE-O-MATIC, INC.,

Plaintiff,

v.

Docket No. 1:20-cv-00292

ECKERT SEAMANS CHERIN & MELLOTT,  
LLC,

Defendant.

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**ECKERT SEAMANS CHERIN & MELLOTT, LLC'S  
RESPONSES TO PACE-O-MATIC, INC.'S  
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS**

Defendant, Eckert Seamans Cherin & Mellott, LLC. (hereinafter referred to as "Eckert), by and through its attorneys, Fox Rothschild LLP, hereby responds to the First Request for Production of Documents of Plaintiff, Pace-O-Matic, Inc. ("POM"), pursuant to Federal Rule of Civil Procedure 34.

**I. GENERAL OBJECTIONS**

1. Eckert objects to POM's document requests to the extent that they exceed the scope of discovery as stated by the Federal Rules of Civil Procedure. Eckert will only respond to plaintiff's document requests within the limits set forth in Federal Rule of Civil Procedure 34.

2. Eckert objects to any document request that calls for information protected by the attorney-client privilege and/or the work-product doctrine. By making a response to any such document request, Eckert does not waive the attorney-client privilege and/or work-product doctrine as to that document request or as to any other present or future document request. Further, to the extent that Eckert inadvertently produces any information that, in whole or in part, contains information protected by the attorney-client privilege and/or

work-product doctrine, the production of such information does not waive the protection of the attorney-client privilege and/or work-product doctrine.

3. Eckert objects to POM's document requests to the extent that they call for proprietary and/or confidential information. Eckert will only consider setting forth information responsive to these document requests in accordance with a stipulated protective order entered into by the parties.

Notwithstanding the foregoing objections, Eckert responds as follows:

**REQUESTS FOR PRODUCTION OF DOCUMENTS**

1. Any and all documents that refer or relate to communications with any agent, employee, representative or affiliate of Pace-O-Matic, Inc. relating to the terms of any engagement.

**RESPONSE: Eckert will produce all responsive, non-privileged documents.**

2. Any and all documents that refer or relate to or otherwise embody communications with any person or entity concerning the matter captioned *POM of Pennsylvania, LLC v. Commonwealth of Pennsylvania, Department of Revenue and City of Philadelphia*, docketed at No. 418 M.D. 2018 in the Commonwealth Court of Pennsylvania, or the matter captioned *POM of Pennsylvania, LLC v. Pennsylvania State Police, Bureau of Liquor Control Enforcement*, docketed at No. 503 M.D. 2018 in the Commonwealth Court of Pennsylvania, including, but not limited to, communications with any *amicus* counsel representing Greenwood Gaming & Entertainment, Inc. d/b/a Parx Casino and communications to municipal, government and regulatory bodies that reference or relate to either action.

**RESPONSE: Objection. Eckert objects to such a request because the information sought is protected by the attorney-client privilege, client confidentiality and the attorney work product doctrine. Eckert further objects to the request as overbroad, unduly burdensome and unlikely to lead to the discovery of admissible evidence.**